



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 26 2015

CERTIFIED MAIL 70091680000076487221
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Ms. Virginia Purvis
EHS Manager
Evonik Corporation
900 South Palm Street
Janesville, Wisconsin 53548

Re: Notice of Violation
Compliance Evaluation Inspection
WID094361458

Dear Ms. Purvis:

On March 3, 2015, a representative of the U.S. Environmental Protection Agency inspected the Evonik Goldschmidt Corporation facility located in Janesville, Wisconsin (Evonik). As a large quantity generator of hazardous waste, Evonik is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Evonik's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Evonik, EPA's review of records pertaining to Evonik, and the inspector's observations, EPA has determined that Evonik has unlawfully stored hazardous waste without a license or interim status as a result of Evonik's violation of certain requirements for a license exemption under Wis. Admin. Code § NR 662.034(1)-(3). EPA has identified the license exemption requirement(s) violated by Evonik as of the date of the inspection in paragraphs 1-5, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS

At the time of the inspection, Evonik violated the following large quantity generator license exemption requirements:

1. Date When Each Period of Accumulation Begins

Under Wis. Admin. Code § NR 662.034(1)(b) [40 C.F.R. § 262.34(a)(2)], a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, Evonik maintained twelve 55-gallon drums of hazardous waste solids containing isopropanol (Varisoft 137) in the facility's 90-day storage area in warehouse C, that were not marked with the date upon which each period of accumulation of hazardous waste began.

2. Contingency Plan Distribution

Under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.0053(2) [40 C.F.R. §§ 262.34(a)(1)(ii) and 265.53(b)], a large quantity generator must submit copy of the contingency plan and all revisions to the plan to local emergency authorities.

At the time of the inspection, Evonik did not submit copy of the contingency plan and all revisions to the local hospital and police department.

3. Content of Contingency Plan

Under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.0052(1) and (3)- (6) [40 C.F.R. §§ 262.34(a)(1)(ii) and 265.52(a) and (b)- (f)], a large quantity generator must have a contingency plan that includes/describes: actions facility personnel must take during emergencies involving hazardous waste, emergency arrangements agreed to with local emergency authorities, names, addresses and phone numbers of current emergency coordinators, emergency equipment, and evacuation plan for the facility personnel.

At the time of the inspection, Evonik's contingency plan did not describe emergency arrangements Evonik agreed to with local emergency authorities, and did not include current list of emergency coordinators.

Summary: By violating the requirements for a license exemption, above, Evonik became an operator of a hazardous waste storage facility, and was required to obtain a Wisconsin hazardous waste storage license. Evonik failed to apply for such a license. Evonik's failure to apply for and obtain a hazardous waste storage license violated the requirements of Wis. Admin. Code §§ NR 680.30, 680.31, and 680.32 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)].

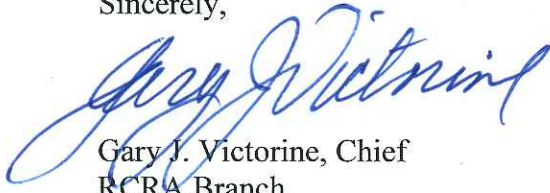
At this time, EPA is not requiring Evonik to apply for a Wisconsin hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1-5, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us

no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions and generator requirements. You should submit your response to Derrick Samaranski, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.”

If you have any questions regarding this letter, please contact Mr. Samaranski, of my staff, at 312-886-7812 or at Samaranski.Derrick@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Michael Ellenbecker, WI DNR, Michael.Ellenbecker@wisconsin.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR-8J
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Evonik Goldschmidt Corporation


EPA ID No.: WID094361458

ADDRESS: 900 S. Palm Street
Janesville, Wisconsin 53548

DATE OF INSPECTION: March 3, 2015

EPA INSPECTOR: Derrick Samaranski
Environmental Engineer

PREPARED BY:


Derrick Samaranski
Compliance Section 2

04/15/2015
Date Completed

APPROVED BY:


Julie Morris, Chief
Compliance Section 2

4/17/15
Date

Purpose of Inspection

This inspection was an evaluation of the Evonik Goldschmidt Corporation's ("Evonik") compliance with hazardous waste, used oil, and universal waste regulations found at Wisconsin Administrative Code (WAC) and the Code of Federal Regulations (CFR). The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI). The site notified as a large quantity generator of hazardous waste.

Participants

Inspector(s):

Derrick Samaranski, Environmental Engineer, EPA

Site Representatives:

Timothy Schuster, Site Manager

Introduction

On March 3, 2015, I arrived at the location of the Evonik facility at 9:30 AM, and proceeded to speak with the facility's receptionist who informed me that Mr. Schuster would be arriving to meet with me. Before meeting with Mr. Schuster I was asked to watch site's safety orientation video.

When Mr. Farhney arrived in the reception area I presented my official credentials, gave Mr. Farhney my business card, and explained the purpose of my visit. During the opening conference with Mr. Farhney I asked for a description of Evonik's operations and a listing of solid and hazardous waste streams generated by the facility. Mr. Farhney informed me that Evonik replaced its environmental coordinator recently and the position is currently occupied by Ms. Virginia Purvis. Ms. Purvis was not available during my visit as she was attending training outside of the facility.

I informed Mr. Schuster that Evonik could claim any information gathered during the inspection as Confidential Business information including: verbal information, documents and photographs. Mr. Schuster did not make a CBI claim on the information gathered during the inspection.

Site Description

The following information about Evonik is based on the personal observations of the U.S. EPA inspector and on representations made during the Inspection by the Facility personnel identified above or within the text or otherwise specified.

Evonik is a chemical manufacturer who produces intermediates and finished products for the personal care, house hold, and specialty chemicals sectors. The facility batch manufactures its products in reactors that are housed in manufacturing areas A1 and A2. Area A1 is the older, larger and more product complex part of the facility whereas area A2 is smaller and produces less complex products. Raw materials at the facility arrive by tanker truck, rail cars, and containers and are stored in several outdoor tank farms which include over 100 tanks ranging in volume from 750- 30,000 gallons. Most of the tank farms are used interchangeably for storage of raw materials and finished products with few that are dedicated to storing either product or raw material only. Evonik works with eighty nine different raw materials to manufacture its products. Finished products are offered for shipment in containers or tanker trucks. The facility occupies thirty eight acres with eight acres under roof. Operations are run twenty four hours seven days a week.

Support operations at Evonik include: maintenance, warehousing, quality assurance lab, research lab, waste water management, loading and unloading, and steam generation.

Manufacturing operations at Evonik generate bulk hazardous and non-hazardous waste streams which result from process disruptions and quality assurance problems. In addition to bulk waste streams Evonik also generates hazardous lab wastes, used oil, and universal wastes. Hazardous wastes are managed in containers which are stored in a 90-day accumulation area in one of the warehouses prior to off-site disposal.

Evonik used process knowledge, analytical testing, and Material Data Safety Sheets (MSDS) to conduct waste determinations of its waste streams.

Site Tour

The site walk-through of the facility started at 12:15 PM, and began with a visit to the facility's 90-day hazardous waste storage area which was located in the north west corner of Warehouse C. At the time of our visit to the Evonick's 90-day storage area, I observed twelve shrink wrapped 55-gallon drums stored on wooded pallets. All of the observed drums were labeled with hazardous waste labels which described the waste as "Solids containing Liquid NOS (Isopropanol). The drum labels identified Evonik as the generator of the hazardous waste. None of the observed hazardous waste drums were labeled with accumulation start dates. Mr. Schuster explained that the twelve drums present in the facility's 90-day storage area were returned Varisoft 137 product which had higher than normal water content. According to Mr. Schuster the hazardous waste drums may have been in to the storage area for three weeks. Behind the hazardous waste containers I observed a 55-gallon drum which was accumulating used motor oil filters. The used filters have been drained of used oil and were being accumulated for disposal as scrap metal. A spill kit was located near the hazardous waste area. In addition to storing hazardous waste in Warehouse C, Evonik also operates a 55-gallon satellite aerosol can puncturing unit to collect aerosol wastes. At the time of my visit the aerosol unit was labeled as hazardous waste and was closed. Evonik also accumulates electronic wastes for recycling and non-hazardous off-spec products in Warehouse C. I observed a labeled pallet of loose electronic

equipment which was dated 02/02/2015 and containers of off-spec product A0419A. A0419A was identified as being non-hazardous.

After visiting Evonik's hazardous waste storage area, we visited facility's outdoor waste water beds where Evonik separates fatty oils from plant waste water before discharging the waste water to the local POTW sewer. The separated fatty oils are stored in an outdoor tank prior to disposal off-site as non-hazardous. Evonik regularly cleans its waste water beds and disposes of the collected waste sludge as non-hazardous waste.

Next, we visited the sewer plant where Evonik used to operate a plant boiler which has been replaced by a more capable unit. No hazardous waste is generated by the sewer plant, but maintenance of the sewer pumps may generate non-hazardous solid wastes or used oil.

From the sewer plant we proceeded to the A1 manufacturing area of the facility visiting non-contact cooling water pond, boiler house and dedicated raw material tank farm along the way. No hazardous waste generation was observed in the boiler house or the dedicated raw material tank storage farm. According to Mr. Schuster releases in to the secondary containment of the raw or material tank farms are analyzed, drummed and offered for disposal. Non-contact cooling water from the pond is directly discharged to the nearby Rock River under a NPDES permit. In A1 manufacturing area, we visited: reactor area, "A" tank farm which is used for storage of the raw materials, intermediates, and finished products, reactor control room, centrifuging filtration station, drum loading station, product ware house, and main and satellite laboratories. A1 manufacturing area generates bulk of hazardous and non-hazardous wastes as a result of process disruptions and failure to meet quality control standards on the part of raw materials or products. A questionable batch will be analyzed, stored in the main warehouse, evaluated for possible reuse, and if determined to be waste moved to warehouse "C." Hazardous wastes which may also generated as a result of customer returns are managed in the same manner. All of Evonik's generated hazardous wastes are stored in the 90-day hazardous waste area of warehouse "C."

The site-walk-through continued with a visit to material tank farms "D," "C," "B," "E," and "H." Tank farm "C" is dedicated to storage of raw solvents whereas the other tank farms are used interchangeably for storage of products and raw materials. During our visit to tank farm "C" we visited filtration waste salt box and looked at the rail material unloading area. The salt waste comes from the reactor product separation and is managed as non-hazardous waste. In tank farm "B" Evonik uses a 2,000 gallon tank for storage of used oil generated from servicing mechanical equipment. The used oil tank was equipped with secondary containment and was labeled as "Used Oil."

After visiting material tank farms, we visited Evonik's maintenance shop where the facility operates a parts washer, aerosol can collection container, and stores universal wastes prior to recycling off-site. The parts washer was identified as using non-hazardous water based cleaner/degreaser. Evonik collects faulty aerosol cans in a container in the maintenance shop before determining if the aerosol products will be reused or disposed as waste. The facility's universal waste area held containers of used fluorescent bulbs and used batteries. All of the

Next, I reviewed Evonik's used oil and universal waste shipment documents. Used oil is offered for off-site recycling to Advanced Waste Services and universal wastes are sent to Midwest Recycling. Evonik has several shipments a year of universal wastes which include e-wastes, used lamps, batteries, and mercury containing devices. Last off-site shipment of universal waste from the facility occurred on 08/15/2014.

Next, I reviewed 2012-2015 weekly inspection records and 2012-2015 hazardous waste manifest records. No issues of concern were noted as a result of the weekly inspection and hazardous waste manifest review. Evonik last offered its hazardous waste for disposal on 02/27/2015.

After reviewing weekly inspection records and hazardous waste manifests I reviewed Evonik's available Land Disposal Restriction Forms and took several copies of associated hazardous waste manifests. I requested that Evonik provide me with copies of missing LDRs which Mr. Schuster explained were probably kept by the environmental contact.

The records review ended with a review of Evonik's Contingency Plan documents. I reviewed parts of Environmental System Work Instruction and Spill Prevention, Control and Countermeasures Plan. Mr. Schuster was not sure if the facility had a dedicated hazardous waste Contingency Plan and referred me to speak with Ms. Purvis. I noted that both reviewed documents still listed Mr. Hilden (former emergency contact) as the emergency coordinator.

Closing Conference

For the inspection close-out conference I requested records which were not readily available at the time of my visit. I gave the facility representative Small Business Resource Sheet and Wisconsin's Solid and Hazardous Waste Education Center (SHWEC) handout. During the closeout conference I discussed Evonik's storage of hazardous waste in containers which were missing accumulation start dates and material reuse procedures. The inspection of the facility ended at 6:00 PM.

Post-Inspection

Prior to completion of this inspection report, I spoke with Ms. Purvis regarding the information which I was not able to obtain during the CEI on 03/03/2015. Ms. Purvis assured me that she was working on gathering the unavailable records and would be sharing them with me as soon as possible. During our phone conversation I was also informed that hazardous waste observed in the facility's 90-day storage area was to be managed as hazardous waste and not as recyclable materials as I was told at the end of the inspection.

observed universal waste containers were labeled, closed, and dated with accumulation start dates. The oldest observed accumulation start date was 11/19/2014.

The site walk-through ended with a visit to the satellite laboratory of manufacturing area A2. At the time of the visit to the lab I observed a 10-gallon container accumulating hazardous lab waste. The container was closed and labeled as "Hazardous Waste." Bulk hazardous and non-hazardous wastes generated by manufacturing area A2 are managed in the same manner as wastes in manufacturing area A1. The site walk-through of the facility ended at 2:55 PM.

Records Review

For the records review I requested to see the following: hazardous waste manifest records for off-site shipments for the last three years (2012-2015), hazardous waste and non-hazardous waste stream determinations, weekly inspections logs of the 90-day hazardous waste storage area, Contingency Plan, spill logs, Land Disposal Restriction Forms for hazardous waste streams, used oil and universal waste shipment documents. The records review started after lunch break and concluded after the second part of the site walk-through.

First, I reviewed Evonik's hazardous and non-hazardous waste profiles and analytical results of waste streams generated by the facility. My review included waste profiles from Badger Disposal (WID988580056), WRR Environmental (WID99082947), Veolia and Brenntag (WID023350192). I reviewed the following waste stream profiles: Varisoft DS 355 and Li 520 off-spec and unused products (non-hazardous), off-spec amine (D002), off-spec amine liquid (non-hazardous), unused castor oil (non-hazardous), Falc C 10V and C1618N unused products (non-hazardous), CE-DEEDMAC ethanol containing (D001), Varisoft 950 (D001), unused Varisoft 110 (D001), off-spec molten CE-DDEEMAC (D001), unused Variquate 638 (D001), lab packs (various hazardous waste codes), fatty amine (D002), unused Variquate B 126 E (D001), unused product Adogen 442 and 446 (D001), off-spec dimethylaminoethanol (D001), spill clean-up (D009), bulk flammable resins from labs (D001), one time disposal of DXP 5534 - 128 (D001), Varisoft TT (non-hazardous), Variionic T 202-T202SR (non-hazardous), unused DXP-C S800 (D001), waste carbon from tank farm D (D001), waste chloroform (D022, D035), off-spec flammable liquid (D001), pit sludge (non-hazardous), benzyl chloride used carbon (D001), off-spec quaternary compound (D001), isopropyl alcohol (D001), Varisoft BT 85 (D002, D001), Varisoft BT pellet (D001), waste methyl alcohol, waste dimethylaminopropylene (D001), Varisoft 432 (D002). I also reviewed landfill analysis of salt waste and spill contaminated soil which Evonik disposed. The salt and soil wastes were determined to be non-hazardous.

After reviewing Evonik's waste profiles, I reviewed print-outs of training records Evonik employees have taken over the years and copies of certificates of completion. All of Evonik's eighty employees are required to take number of safety, environmental, and awareness type training annually. I asked Mr. Schuster for a copy of training record for an Evonik employee whose main responsibility is hazardous waste management. I asked that the record cover the last three years of refresher training given and include job description and job title of the employee.

Attachments

- A. Photographs
- B. Checklist(s)
- C. List of Documents Copied/Obtained During Inspection
- D. CD of All Photos Taken During the Inspection

ATTACHMENT A
Photographs

Evonik Goldschmidt Corporation
WID094361458



Photograph Number: 1

Photographer: Derrick Samaranski

Date: 03/03/2015

Photograph Description: Warehouse "C" showing storage of 12 55-gallon drums of hazardous waste and aerosol satellite container.

Evonik Goldschmidt Corporation
WID094361458



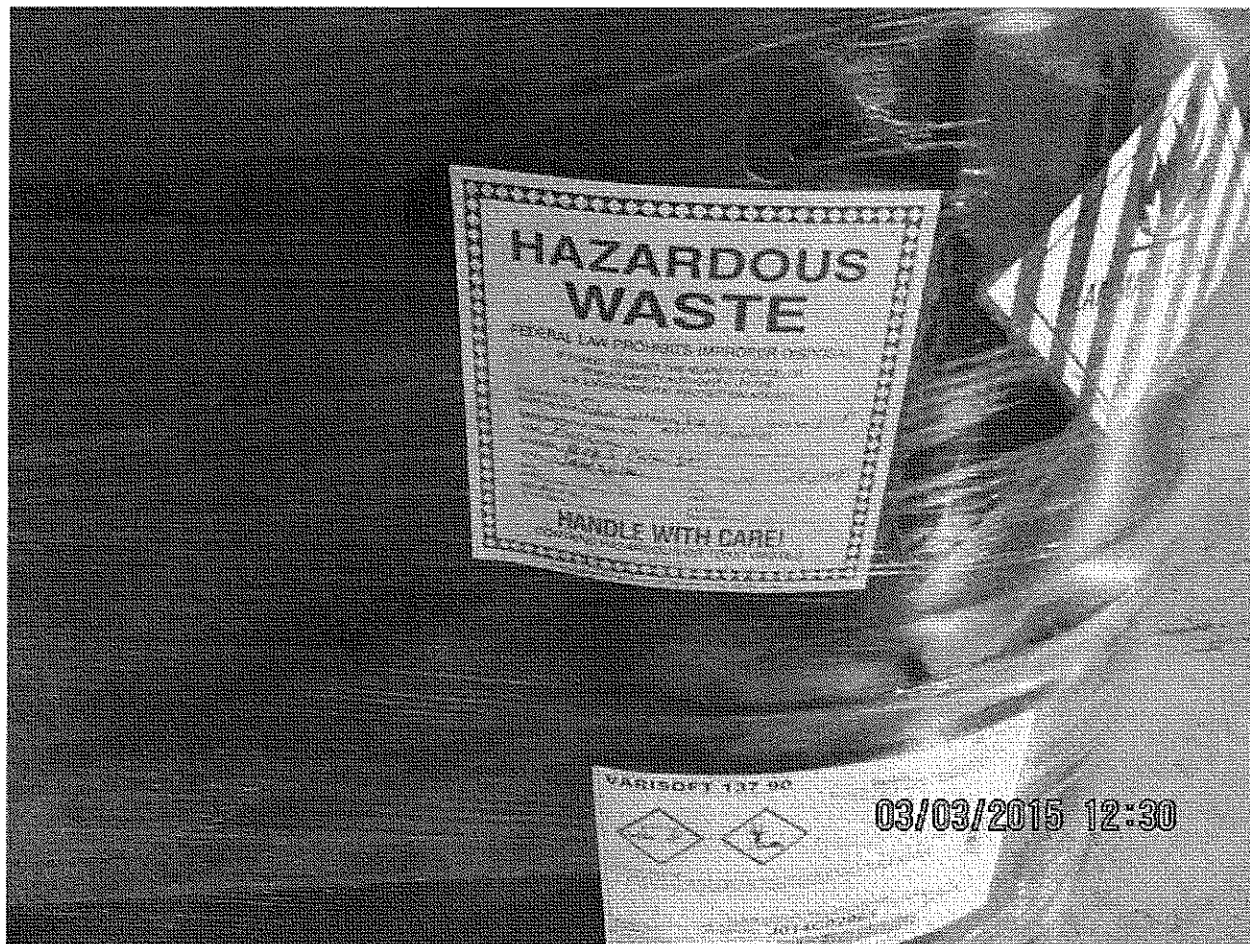
Photograph Number: 2

Photographer: Derrick Samaranski

Date: 03/03/2015

Photograph Description: Additional view of the hazardous waste drums pictured in photo #1.

Evonik Goldschmidt Corporation
WID094361458

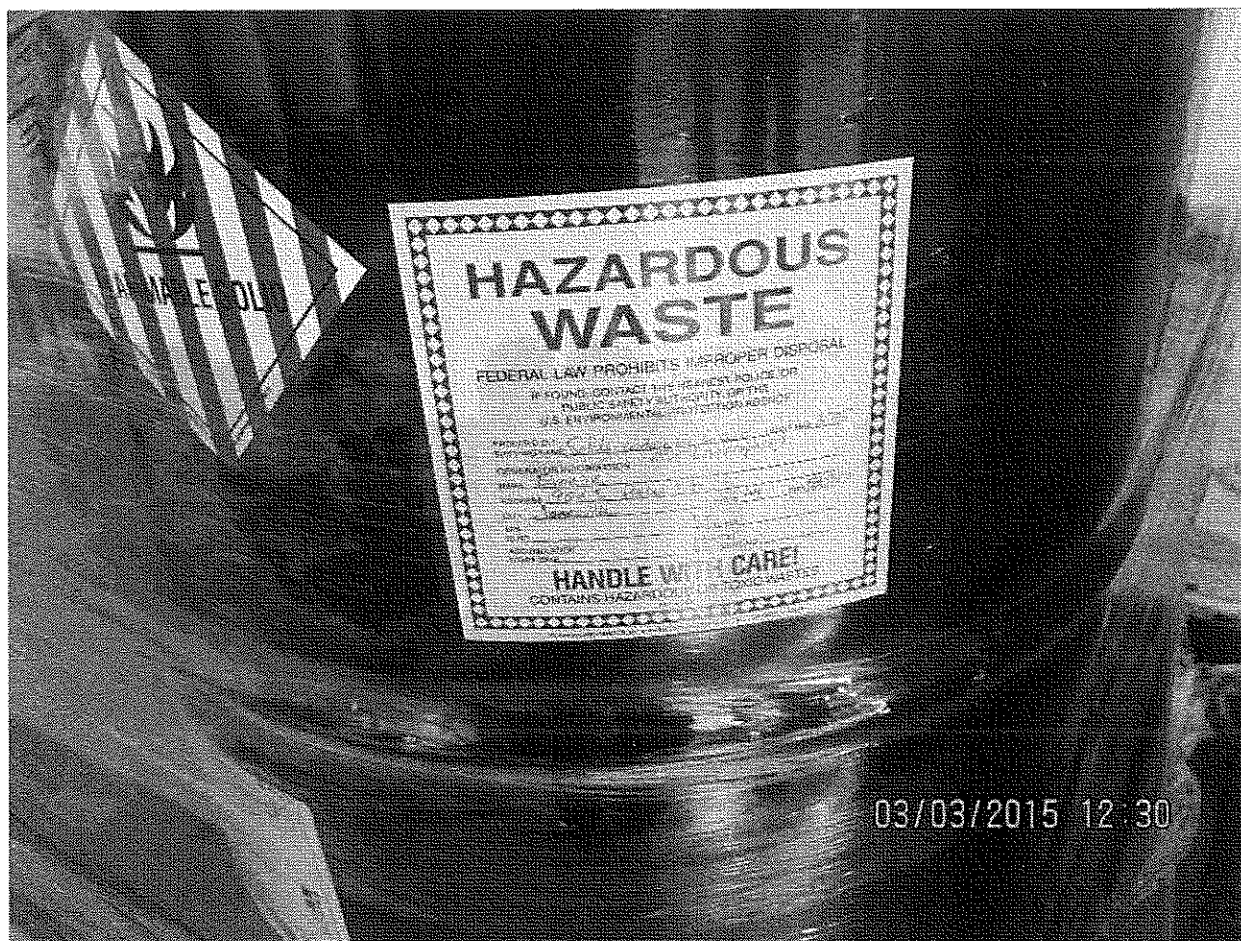


Photograph Number: 3

Photographer: Derrick Samaranski

Date: 03/03/2015

Photograph Description: Sample of labeling found on Evonik's hazardous waste drums in the facility's 90-day storage area (missing accumulation start date).



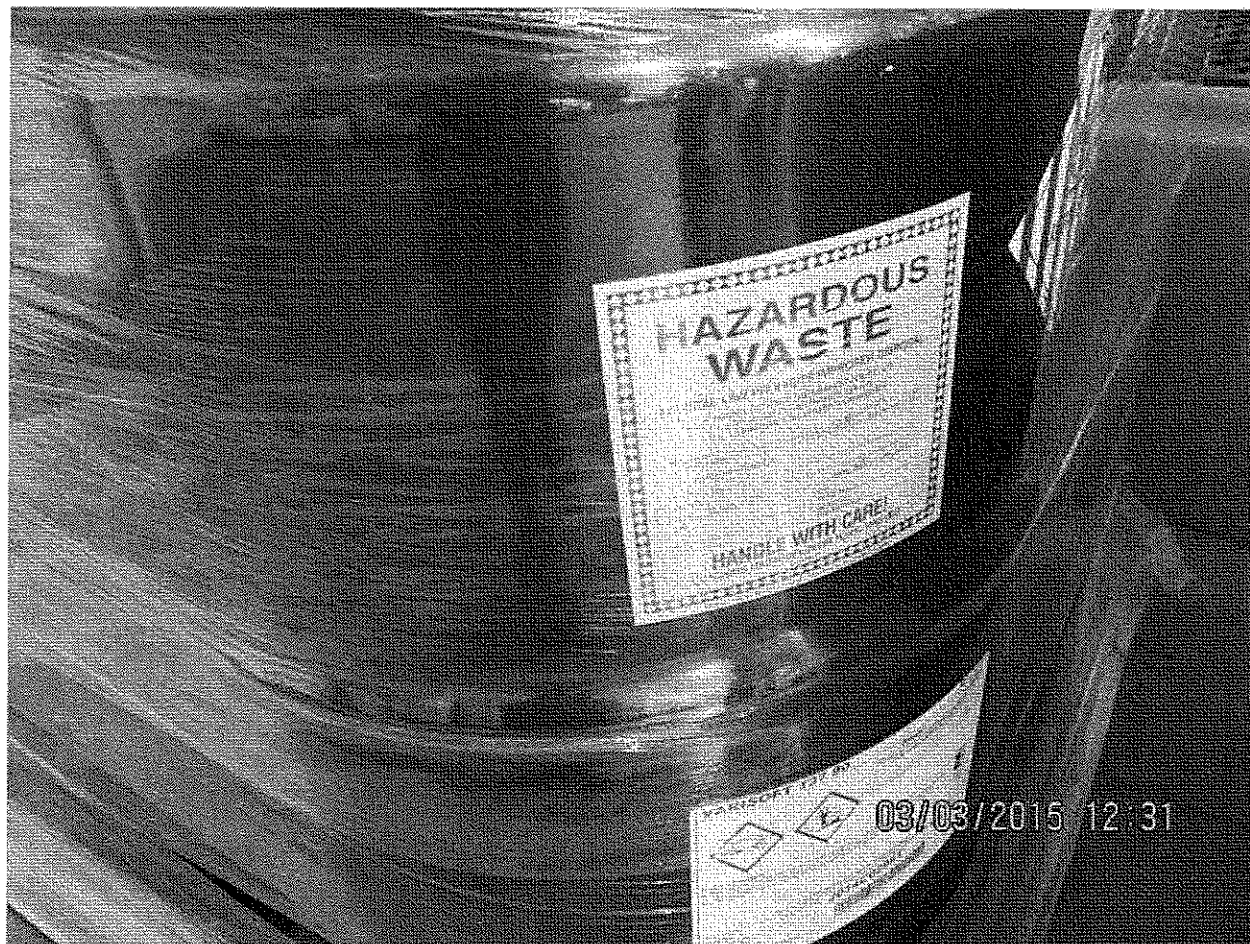
Photograph Number: 4

Photographer: Derrick Samaranski

Date: 03/03/2015

Photograph Description: Additional labeling on Evonik's hazardous waste drums in the facility's 90-day storage area (missing accumulation start date).

Evonik Goldschmidt Corporation
WID094361458



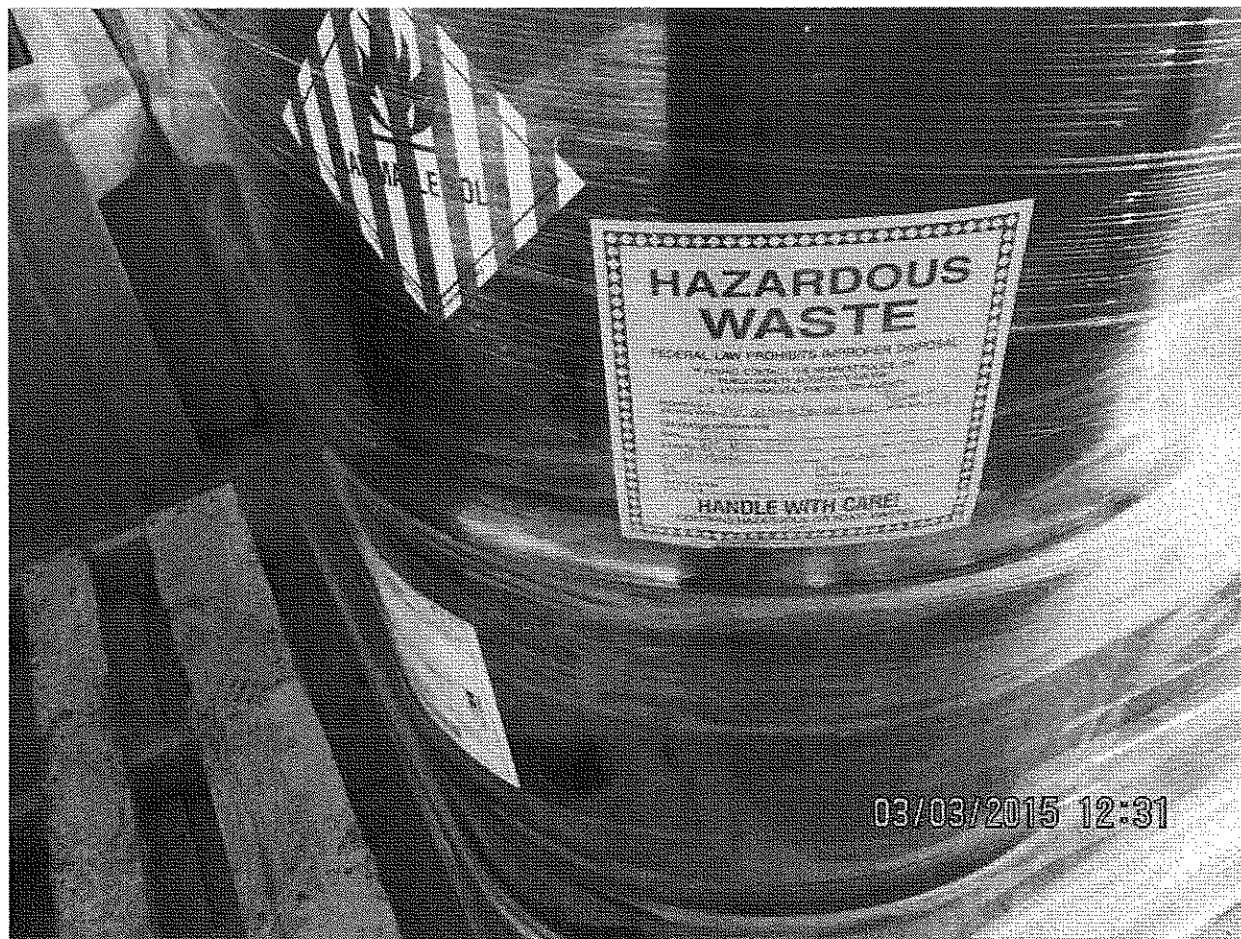
Photograph Number: 4

Photographer: Derrick Samaranski

Date: 03/03/2015

Photograph Description: Additional labeling on Evonik's hazardous waste drums in the facility's 90-day storage area (missing accumulation start date).

Evonik Goldschmidt Corporation
WID094361458



Photograph Number: 5

Photographer: Derrick Samaranski

Date: 03/03/2015

Photograph Description: Additional labeling on Evonik's hazardous waste drums in the facility's 90-day storage area (missing accumulation start date).

ATTACHMENT B

ATTACHMENT C
Documents Copied

Document	Date
Copy of the Evonik's Site Map	03/03/2015
Copy of Evonik's Waste Profile for Salt Waste,	03/03/2015
Copy of Evonik's Invoice for Disposal of Universal Waste (04/30/2012)	03/03/2015
Copies of 2015-2014 Manifests	03/03/2015
Copies of the Select LDRs	03/03/2015
Copy of pgs. 9-10 of Evonik's SPCC Plan	03/03/2015
Copy of pg. 13 of Evonik's Environmental System Work Instruction	03/03/2015
Copy of the Evonik's 2013 Biennial Hazardous Waste Report	Received as e-mail on 04/01/2015



Revision: 03/19/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

LARGE QUANTITY GENERATOR INSPECTION

This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated.	C	662.011 Photo <input type="checkbox"/>
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.	C	662.011(3) Photo <input type="checkbox"/>
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers.	C	662.011(3)(a)1 Photo <input type="checkbox"/>
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	C	662.040(3) Photo <input type="checkbox"/>
E. Generator submitted a notification form and obtained an EPA ID#. Note: A subsequent notification should be submitted when there is an ownership or name change.	C	662.012 Photo <input type="checkbox"/>

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.	C	662.020(1) Photo <input type="checkbox"/>
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	C	662.020(1) Photo <input type="checkbox"/>
C. The facility designated on the manifest is permitted or licensed to accept the waste.	C	662.020(2) Photo <input type="checkbox"/>
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	C	662.023(3) Photo <input type="checkbox"/>
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	C	662.020(1) Photo <input type="checkbox"/>
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	N/A	662.034(13) Photo <input type="checkbox"/>
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	N/A	662.034(13) Photo <input type="checkbox"/>
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	C	662.040(1) Photo <input type="checkbox"/>
I. Copy of each manifest is kept for at least three years from the date of shipment.	C	662.040(1) Photo <input type="checkbox"/>
J. Hazardous waste is packaged according to applicable DOT requirements before transport.	C	662.030 Photo <input type="checkbox"/>

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected
Noncode ? : Y: Yes N: No UN: Unknown

Notes : *: Dept. approved alternate may apply No 'box' is an open ended question



Revision: 03/19/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

LARGE QUANTITY GENERATOR INSPECTION

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

K. Hazardous waste is labeled according to applicable DOT requirements before transport.	N/A	662.031 Photo <input type="checkbox"/>
L. Hazardous waste is marked according to applicable DOT requirements before transport.	N/A	662.032(1) Photo <input type="checkbox"/>
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	N/A	662.032(2) Photo <input type="checkbox"/>
N. Placards are offered to the initial transporter.	C	662.033 Photo <input type="checkbox"/>

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	C	668.07(1) Photo <input type="checkbox"/>
B. Generator complies with the prohibition against dilution of wastes.	C	668.03 Photo <input type="checkbox"/>
C. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	ND	668.07(1) Photo <input type="checkbox"/>
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	ND	668.07(1) Photo <input type="checkbox"/>
E. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	N/A	668.07(1) Photo <input type="checkbox"/>
F. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions.	C	668.07(1) Photo <input type="checkbox"/>
G. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	ND	668.07(1)(h) Photo <input type="checkbox"/>
H. Underlying hazardous constituents have been identified for characteristic wastes.	C	668.09(1) Photo <input type="checkbox"/>
I. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	ND	668.09(2) Photo <input type="checkbox"/>
J. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	NA	662.034(1)(d) Photo <input type="checkbox"/>



Revision: 03/19/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

LARGE QUANTITY GENERATOR INSPECTION

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year.	C	662.041 Photo <input type="checkbox"/>
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	C	662.042(1) Photo <input type="checkbox"/>
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	N/A	662.042(2) Photo <input type="checkbox"/>
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	C	662.040(2) Photo <input type="checkbox"/>

Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	C	662.034(1)(d) Photo <input type="checkbox"/>
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033).	C	662.034(1)(d) Photo <input type="checkbox"/>
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034).	C	662.034(1)(d) Photo <input type="checkbox"/>
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	ND	662.034(1)(d) Photo <input type="checkbox"/>
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	C	662.034(1)(d) Photo <input type="checkbox"/>

Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A.	ND	662.034(1)(d) Photo <input type="checkbox"/>
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Revision: 03/19/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

LARGE QUANTITY GENERATOR INSPECTION

Section 6: Contingency Plan and Emergency Procedures

B. Generator has amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).	ND	662.034(1)(d) Photo <input type="checkbox"/>
C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0052(3)).	X	662.034(1)(d) Photo <input type="checkbox"/>
D. Contingency plan was amended due to ANY of the following (NR 665.0054): 1. Contingency plan failed in an emergency. 2. Change in site design, construction, O&M, or other circumstances which affect emergency response. 3. Emergency coordinators changed. 4. Emergency equipment changed.	C	662.034(1)(d) Photo <input type="checkbox"/>
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055): 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	C	662.034(1)(d) Photo <input type="checkbox"/>
F. Contingency plan includes ALL of the following (NR 665.0052): 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge. 6. List of emergency equipment at the site, including location, description and capabilities of each item.	X	662.034(1)(d) Photo <input type="checkbox"/>
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056): 1. Activate internal alarms or communication systems. 2. Notify appropriate authorities, if their help is needed. 3. Identify the character, source, amount, and extent of discharged hazardous materials. 4. Assess hazards to human health and the environment. 5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation. 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days.	C	662.034(1)(d) Photo <input type="checkbox"/>



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Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A.	C	662.034(1)(d) Photo <input type="checkbox"/>
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).	C	662.034(1)(d) Photo <input type="checkbox"/>
C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	C	662.034(1)(d) Photo <input type="checkbox"/>
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	C	662.034(1)(d) Photo <input type="checkbox"/>
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	C	662.034(1)(d) Photo <input type="checkbox"/>
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	C	662.034(1)(d) Photo <input type="checkbox"/>
G. Personnel take part in an annual review of the training (NR 665.0016(3)).	C	662.034(1)(d) Photo <input type="checkbox"/>
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	ND	662.034(1)(d) Photo <input type="checkbox"/>
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	C	662.034(1)(d) Photo <input type="checkbox"/>

Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9.	C	 Photo <input type="checkbox"/>
B. Accumulation start date is clearly marked and visible for inspection on each container.	X	662.034(1)(b) Photo <input type="checkbox"/>
C. All containers are clearly marked with the words "Hazardous Waste".	C	662.034(1)(c) Photo <input type="checkbox"/>



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Section 8: 90-Day Container Accumulation

D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	C	662.034(1)(a)1 Photo <input type="checkbox"/>
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	C	662.034(1)(a)1 Photo <input type="checkbox"/>
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).	C	662.034(1)(a)1 Photo <input type="checkbox"/>
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	C	662.034(1)(a)1 Photo <input type="checkbox"/>
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	C	662.034(1)(a)1 Photo <input type="checkbox"/>
I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).	C	662.034(1)(a)1 Photo <input type="checkbox"/>
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	C	662.034(1)(a)1 Photo <input type="checkbox"/>
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	C	662.034(1)(a)1 Photo <input type="checkbox"/>
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	C	662.034(1)(a)1 Photo <input type="checkbox"/>

Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration $\geq 10\%$ by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2)). 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service. 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	N/A	 Photo <input type="checkbox"/>
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).		662.034(1)(a) Photo <input type="checkbox"/>
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).		662.034(1)(a) Photo <input type="checkbox"/>
D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).		662.034(1)(a) Photo <input type="checkbox"/>

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected
Noncode ? : Y: Yes N: No UN: Unknown

Notes : *: Dept. approved alternate may apply No 'box' is an open ended question



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Section 9: Subchapter BB Standards for Equipment Leaks

E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)):

1. Analysis determining the design capacity of the hazardous waste management unit.
2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids.
3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.

N/A

662.034(1)(a)

Photo ☐

F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)):

1. Information that the production process does not use organic compounds.
2. The process is identical to a process at another facility where the total organic content was measured at <10%.
3. The process has not changed to affect the total organic concentration of the waste.

N/A

662.034(1)(a)

Photo ☐

G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).

N/A

662.034(1)(a)

Photo ☐

H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.

N/A

Photo ☐

Section 10: Subchapter CC Level 1 Container Standards

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 10.R. (NR 665.1087(2)(a), NR 662.034(1)(a)1).

1. Between 26 and 119 gallons.
2. Greater than 119 gallons and not in light material service.

N/A

Photo ☐

B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)):

1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container.
 2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container.
 3. The initial determination is reviewed and updated at least once every 12 months.
 4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to ≥ 500 ppmw.
 5. The average VO concentration is determined by direct measurement or by knowledge.
- Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.

N/A

Photo ☐

C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).

N/A

662.034(1)(a)1

Photo ☐

D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)).

N/A

Photo ☐

Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.

E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)):

1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities.
2. Radioactive mixed wastes in accordance with NRC requirements

N/A

Photo ☐



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Section 10: Subchapter CC Level 1 Container Standards

<p>F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090.(10)):</p> <ol style="list-style-type: none"> 1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements. 2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers 	<p>NA</p>	<p><input type="text"/></p> <p>Photo <input type="checkbox"/></p>
<p>G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Question 10.R.</p>	<p>NA</p>	<p><input type="text"/></p> <p>Photo <input type="checkbox"/></p>
<p>H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)):</p> <ol style="list-style-type: none"> 1. Container meets applicable US DOT packaging requirements. 2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. 3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere. <p>Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.</p>	<p>C</p>	<p>662.034(1)(a)1</p> <p>Photo <input type="checkbox"/></p>
<p>I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).</p>	<p>N/A</p>	<p>662.034(1)(a)1</p> <p>Photo <input type="checkbox"/></p>
<p>J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).</p>	<p>N/A</p>	<p>662.034(1)(a)1</p> <p>Photo <input type="checkbox"/></p>
<p>K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b):</p> <ol style="list-style-type: none"> 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down. 	<p>C</p>	<p>662.034(1)(a)1</p> <p>Photo <input type="checkbox"/></p>
<p>L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b):</p> <ol style="list-style-type: none"> 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container. 	<p>C</p>	<p>662.034(1)(a)1</p> <p>Photo <input type="checkbox"/></p>
<p>M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).</p>	<p>C</p>	<p>662.034(1)(a)1</p> <p>Photo <input type="checkbox"/></p>
<p>N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4):</p> <ol style="list-style-type: none"> 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. 3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications. 	<p>NA</p>	<p>662.034(1)(a)1</p> <p>Photo <input type="checkbox"/></p>
<p>O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).</p>	<p>N/A</p>	<p>662.034(1)(a)1</p> <p>Photo <input type="checkbox"/></p>
<p>P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).</p>	<p>C</p>	<p>662.034(1)(a)1</p> <p>Photo <input type="checkbox"/></p>



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Section 10: Subchapter CC Level 1 Container Standards

Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).

NI

662.034(1)(a)1

Photo ☐

Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12.

N

Photo ☐

B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a))

1. Container meets applicable US DOT packaging requirements.
2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring.
3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.

662.034(1)(a)2

Photo ☐

C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a))

1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve.
2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.

662.034(1)(a)2

Photo ☐

D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))

662.034(1)(a)2

Photo ☐

E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))

662.034(1)(a)2

Photo ☐

F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)

662.034(1)(a)2

Photo ☐

G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.)

662.034(1)(a)2

Photo ☐

1. No additional material will be added within 15 minutes.
2. The person performing the loading operation leaves the immediate vicinity of the container.
3. The process generating the waste shuts down.

H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.)

662.034(1)(a)2

Photo ☐

1. No additional materials will be removed within 15 minutes.
2. The person removing the waste leaves the immediate vicinity of the container.

I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)

662.034(1)(a)2

Photo ☐



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Section 11: Subchapter CC Level 2 Container Standards

J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.)

1. Designed to operate with no detectable organic emissions when in the closed position.
2. Closed when the internal pressure is within the specified operating range.
3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.

662.034(1)(a)2

Photo ☐

K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)

662.034(1)(a)2

Photo ☐

L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)

662.034(1)(a)2

Photo ☐

M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)

662.034(1)(a)2

Photo ☐

Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.

N

Photo ☐

B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))

662.034(1)(a)2

Photo ☐

C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)

662.034(1)(a)2

Photo ☐

D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))

662.034(1)(a)2

Photo ☐

E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))

662.034(1)(a)2

Photo ☐

Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.

Y

Photo ☐

B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.

C

662.034(3)(a)

Photo ☐

C. Satellite containers are under the control of the operator of the process generating the waste.

C

662.034(3)(a)

Photo ☐

D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).

C

662.034(3)(a)1

Photo ☐



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Section 13: Satellite Accumulation

E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	C	662.034(3)(a)1 Photo <input type="checkbox"/>
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	C	662.034(3)(a)1 Photo <input type="checkbox"/>
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.	C	662.034(3)(a)2 Photo <input type="checkbox"/>
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	C	662.034(3)(b) Photo <input type="checkbox"/>
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	C	662.034(3)(b) Photo <input type="checkbox"/>

Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report.	C	662.041(3)(e) Photo <input type="checkbox"/>
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree. Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.	C	662.027(1) Photo <input type="checkbox"/>

Section 15: Used Oil

A. Used oil is managed on-site. If NO, go to Section 16	Y	 Photo <input type="checkbox"/>
B. Used oil containing $\geq 1,000$ ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	C	679.10(2)(a)2 Photo <input type="checkbox"/>
C. Used oil containers and tanks are in good condition and not leaking.	C	679.22(2) Photo <input type="checkbox"/>
D. Used oil containers and tanks are marked "used oil".	C	679.22(3)(a) Photo <input type="checkbox"/>
E. Transporter has an EPA ID number, except when generator self-transport or has a tolling agreement.	C	679.24 Photo <input type="checkbox"/>
F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill.	C	 Photo <input type="checkbox"/>



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Section 15: Used Oil

G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met:

1. Only used oil from the generator or household do-it-yourselfers is burned.
2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less.
3. The combustion gases are vented to the ambient air.

N/A

679.23

Photo ☐

H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.

N/A

679.11

Photo ☐

Section 16: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 17.

N

Photo ☐

B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.

662.034(7)

Photo ☐

C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.

662.034(7)(a)

Photo ☐

D. The F006 waste is legitimately recycled through metals recovery.

662.034(7)(b)

Photo ☐

E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.

662.034(7)(c)

Photo ☐

F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.

662.034(7)(d)1.a

Photo ☐

G. The accumulation start date is clearly marked and visible for inspection on each container.

662.034(7)(d)3

Photo ☐

H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.

662.034(7)(d)1.b

Photo ☐

I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".

662.034(7)(d)4

Photo ☐

J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.

662.034(7)(d)1.c

Photo ☐

K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.

662.034(7)(d)5

Photo ☐

L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.

662.034(8)

Photo ☐



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Section 17: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.

C

662.034(1)

Photo ☐

B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).

C

Photo ☐

C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.).

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D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)):

N/A

662.034(1)(a)2

Photo ☐

1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment.
2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.



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UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANTITY HANDLER

This Inspection Form, used for the inspection of facilities that generate or handle less than 5000 kg of universal waste (hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices), evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660-679, Wis. Admin. Code). The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices. Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

Section 1: Prohibitions

A. Universal waste is not disposed on-site.	C	673.11(1) Photo <input type="checkbox"/>
B. Universal waste is not diluted or treated on-site. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	C	673.11(2) Photo <input type="checkbox"/>

Section 2: General Standards

A. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	C	673.13 Photo <input type="checkbox"/>
B. Universal waste pesticides and lamps are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	C	673.13 Photo <input type="checkbox"/>
C. Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact.	C	673.13(1)(b) Photo <input type="checkbox"/>
D. Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules.	C	673.13 Photo <input type="checkbox"/>
E. If mercury containing ampules are removed from thermostats, the handler meets ALL of the following: 1. Ampules are removed in a manner to prevent breakage. 2. Removal is conducted over a containment device. 3. Spills or leaks are immediately cleaned up. 4. Activity is performed in a well ventilated, monitored environment.	N/A	673.13(3)(b) Photo <input type="checkbox"/>
F. Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200.	N/A	673.13(2) Photo <input type="checkbox"/>
G. Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.	N/A	673.13(2) Photo <input type="checkbox"/>
H. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	C	673.14 Photo <input type="checkbox"/>
I. Containers, tanks, or transport vehicles of recalled pesticides are additionally marked with the label that was on or accompanied the product when it was sold or distributed.	N/A	673.14 Photo <input type="checkbox"/>
J. Length of accumulation time is demonstrated by any of the following: 1. Mark or label each container with the earliest date the waste is generated or received. 2. Mark or label the individual item of waste with the date it was generated or received. 3. Maintain an inventory system identifying the date the waste was generated or received. 4. Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received. 5. Use some other method that clearly demonstrates the length of accumulation time.	C	673.15(3) Photo <input type="checkbox"/>
K. Universal waste is accumulated for less than one year from the date generated or received from another handler.	C	673.15(1) Photo <input type="checkbox"/>



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Section 2: General Standards

L. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	NA	673.15(2) Photo <input type="checkbox"/>
M. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	C	673.16 Photo <input type="checkbox"/>
N. Handler complies with ALL of the following when a release occurs: 1. Immediately contains the release. 2. Determines if the spill residue is hazardous waste. 3. If hazardous waste, disposes of it as such.	C	673.17 Photo <input type="checkbox"/>

Section 3: Off-site Shipments

A. Handler sends the waste to a destination facility, foreign destination or another handler.	C	673.18(1) Photo <input type="checkbox"/>
B. Handler that self-transportes complies with ALL of the following: 1. Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials. 2. Immediately contain release and make waste determination on spill residue. 3. If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.	C	673.18(2) Photo <input type="checkbox"/>
C. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	C	673.18(3) Photo <input type="checkbox"/>
D. When shipping to another universal waste handler, the handler has agreed to receive the shipment.	C	673.18(4) Photo <input type="checkbox"/>
E. If a shipment was rejected, EITHER of the following occurred: 1. The waste was sent back to the originating handler. 2. The originating handler agreed on a destination facility to which to ship the waste.	NA	673.18 Photo <input type="checkbox"/>
F. If a shipment contains hazardous waste, the handler receiving the shipment immediately notifies the Department.	C	673.18(7) Photo <input type="checkbox"/>
G. Nonhazardous, nonuniversal waste, in a universal waste shipment is managed in compliance with the solid waste requirements.	C	673.18(8) Photo <input type="checkbox"/>